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Attorneys for Defendant
SALVADOR ORTIZ-PADILLA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

Case No. 1:21-cr-00239-JLT-SKO

**STIPULATION TO CONTINUE CHANGE OF
PLEA HEARING; ORDER**

IT IS HEREBY STIPULATED, by and between the parties through their respective
counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant
Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the change of plea
hearing currently scheduled for January 29, 2024, may be continued to February 20, 2024, at
9:00 a.m.

The parties have been in active plea negotiations regarding a resolution in this case. As a result of these discussions, Mr. Ortiz-Padilla has found it necessary to consult with an immigration attorney to more fully understand the impact of any plea in this case. Accordingly, Mr. Ortiz-Padilla requires additional time and opportunity to discuss these issues with an immigration attorney. Therefore, the parties are requesting to continue the January 29, 2024 change of plea hearing to February 20, 2024. This will provide time for Mr. Ortiz-Padilla to consult with his immigration attorney and for the parties to finalize the plea documents prior to

1 the change of plea hearing.

2 The requested continuance is made with the intention of conserving time and resources
3 for both the parties and the Court. The government is in agreement with this request and the
4 requested date is a mutually agreeable date for both parties. The parties stipulate that for the
5 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the
6 date of this order through February 20, 2024, for defense preparation and investigation, pursuant
7 to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice served by
8 resetting the change of plea hearing outweigh the best interest of the public and the defendant in
9 a speedy trial.

10
11 Respectfully submitted,

12 HEATHER E. WILLIAMS
13 Federal Defender

14 Date: January 23, 2024

15 /s/ Reed Grantham
16 REED GRANTHAM
Assistant Federal Defender
Attorney for Defendant
17 SALVADOR ORTIZ-PADILLA

18 PHILLIP A. TALBERT
19 United States Attorney

20 Date: January 23, 2024

21 /s/ Justin Gilio
22 JUSTIN GILIO
Assistant United States Attorney
23 Attorney for Plaintiff

ORDER

IT IS SO ORDERED. The change of plea hearing currently set for January 29, 2024, is hereby continued to February 20, 2024, at 9:00 a.m.

The time through February 20, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: January 23, 2024

Jennifer L. Thurston
UNITED STATES DISTRICT JUDGE